

Exhibit A

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

HIS TABERNACLE FAMILY CHURCH, INC.)
and MICHEAL SPENCER,)

Plaintiffs,)

v.)

Case No.: 6:22-cv-06486-JLS

STEVEN G. JAMES, Superintendent of the New)
York State Police, in his official and individual)
capacities; WEEDEN A. WETMORE, District)
Attorney for the County of Chemung, New York,)
in his official and individual capacities; and)
MATTHEW VAN HOUTEN, District Attorney)
for the County of Tompkins, New York, in his)
official and individual capacities,)

Defendants.)

DECLARATION OF ERIN E. MURPHY

ERIN E. MURPHY declares under penalty of perjury that the following is true and correct:

1. I am a partner at the law firm Clement & Murphy, PLLC. I, along with other attorneys at Clement & Murphy, represented Plaintiffs in this action in filing a complaint and moving for a preliminary injunction before this Court, and defending this Court's preliminary injunction before the U.S. Court of Appeals for the Second Circuit. I am familiar with the facts and circumstances pertaining to this action. This declaration is submitted in support of Plaintiffs' motion for an award of attorney's fees and costs as the prevailing party pursuant to 42 U.S.C. §1988 and Federal Rule of Civil Procedure 54(d). I am over the age of 18 years and competent to testify to the matters set forth herein.

2. I graduated from Georgetown University Law Center, J.D., *magna cum laude*, in 2006, and Northwestern University Medill School of Journalism, B.S., in 2002. I served as a law clerk to Chief Justice John Roberts of the U.S. Supreme Court and to the Honorable Diane S. Sykes

of the U.S. Court of Appeals for the Seventh Circuit. I also served as a Bristow Fellow in the Office of the Solicitor General.

3. My law practice is devoted substantially to litigation over issues of constitutional and other federal law, with a particular focus on appellate and Supreme Court litigation. I am recognized by Chambers & Partners as one of the leading appellate practitioners in the Nation. See Chambers & Partners, *Appellate Law | USA*, <https://rebrand.ly/5d75fx8>. I have argued and briefed cases before the Supreme Court and appellate and trial courts throughout the country. Specifically, I have argued in the Supreme Court on four occasions—in *McCutcheon v. FEC*, 572 U.S. 185 (2014); *United States v. Texas*, 579 U.S. 547 (2016); *Husky Electronics v. Ritz*, 578 U.S. 355 (2016); and *Gill v. Whitford*, 585 U.S. 48 (2018)—and prevailed in three of them. I have also been one of the lead attorneys in Supreme Court cases involving the First Amendment’s Religion Clauses, such as *Kennedy v. Bremerton School District*, 597 U.S. 507 (2022), and the Second Amendment, such as *New York State Rifle & Pistol Association v. Bruen*, 597 U.S. 1 (2022), and *New York State Rifle & Pistol Association, Inc. v. City of New York*, 590 U.S. 336 (2020) (per curiam). I have argued numerous Second Amendment cases in the federal courts of appeals, including *Bevis v. City of Naperville*, 85 F.4th 1175 (7th Cir. 2023); *Delaware Department of Safety & Homeland Security*, 108 F.4th 194 (3d Cir. 2024); *Duncan v. Bonta*, 970 F.3d 1133 (9th Cir. 2020); 988 F.3d 1209 (9th Cir. 2021); 19 F.4th 1087 (9th Cir. 2021) (en banc); 142 S.Ct. 2895 (2022); Dkt.82, No. 23-55805 (9th Cir. Mar. 19, 2024) (en banc); *Bauer v. Becerra*, 858 F.3d 1216 (9th Cir. 2017); and *Fyock v. Sunnyvale*, 779 F.3d 991 (9th Cir. 2015). I have also argued First Amendment religious-liberty cases in the federal courts of appeals, such as *Duquesne University of the Holy Spirit v. NLRB*, 947 F.3d 824 (D.C. Cir. 2020).

4. As this Court has held, “Plaintiffs are a ‘prevailing party’ under 42 U.S.C. §1988 and therefore are entitled to their reasonable attorneys’ fees from Steven G. James, Acting Superintendent of the New York State Police.” Dkt.81 at 2¹; *see also* Dkt.56; *Antonyuk v. Chiumento*, 89 F.4th 271 (2d Cir. 2023), *certiorari granted and judgment vacated on other grounds by Antonyuk v. James*, 144 S.Ct. 2709 (2024) (Mem.); *Antonyuk v. James*, 120 F.4th 941, 1015 n.75 (2d Cir. 2024).

5. As set forth below, Plaintiffs request \$664,477.50 in attorney’s fees for all work performed by Clement & Murphy personnel in this case. Plaintiffs also request \$1,768.84 to reimburse Clement & Murphy’s costs.

FACTUAL BACKGROUND

6. His Tabernacle Family Church, Inc. and Micheal Spencer (collectively, “Plaintiffs”) were subject to New York’s Penal Law §265.01-e(c) (hereinafter, “S51001”), which prohibited the carrying of firearms in “sensitive places,” including houses of worship. New York enacted that restriction on July 1, 2022, and it took effect on September 1, 2022.

7. Plaintiffs secured representation from Clement & Murphy and two other law firms soon thereafter. Plaintiffs did not have a prior relationship with Clement & Murphy, and Clement & Murphy agreed to an arrangement under which it would receive payment only if Plaintiffs prevailed in this litigation and could recover attorney’s fees pursuant to 42 U.S.C. §1988.

8. On November 3, 2022, Plaintiffs filed a complaint in this Court challenging S51001’s prohibition on carrying firearms in houses of worship as violating the First Amendment’s Free Exercise and Establishment Clauses, the Second Amendment, and the Fourteenth Amendment’s Equal Protection Clause. Dkt.1 at 17, 20, 22, 23. Plaintiffs sought declaratory and

¹ “Dkt.” references docket entries in this case in this Court unless otherwise noted.

injunctive relief, nominal damages, and attorney's fees under 42 U.S.C. §§1983, 1988. Dkt.1 at 24-25. Plaintiffs then moved for a preliminary injunction on November 8, 2022. Dkt.13. On December 29, 2022, this Court preliminarily enjoined S51001's prohibition on firearms in houses of worship. Dkt.56 at 2.

9. The Second Circuit affirmed this Court's grant of a preliminary injunction on December 8, 2023. *See Antonyuk*, 89 F.4th at 345-52; *see also Antonyuk*, 120 F.4th at 1015 n.75.

10. On remand, this Court on November 4, 2024, entered a Stipulated Order that grants a permanent injunction preventing state officials from implementing and enforcing the houses-of-worship prohibition against Plaintiffs. Dkt.81. This Court further ordered that "Plaintiffs are a 'prevailing party' under 42 U.S.C. §1988 and therefore are entitled to their reasonable attorneys' fees from" the state. Dkt.81 at 2. This Court stated that it "will decide the amount of reasonable attorneys' fees" at later time. Dkt.81 at 2.

APPLICATION FOR ATTORNEY'S FEES

11. Clement & Murphy performed work at all stages of this action, from drafting and filing the complaint, drafting and filing the motion for preliminary injunction, presenting oral argument and conducting witness examination in this Court, drafting and filing motions and briefs in the Second Circuit, and presenting oral argument in the Second Circuit.

12. In my experience leading national appellate and Supreme Court practices at Clement & Murphy, Kirkland & Ellis LLP, and Bancroft PLLC, I have become familiar with the economics of law practice, billing rates, billing practices, the cost and recovery of litigation support services and other expenses of litigation, the setting and collection of legal fees in a variety of circumstances, including cases presenting professional demands, factual and legal complexity, and the risk and expense levels comparable to the instant action. I am also familiar with the manner in

which Clement & Murphy maintains its business records and generates its billing records. I have personal experience negotiating fee arrangements with sophisticated consumers of legal services and regularly represent clients on an hourly rate basis in similar complex litigation matters. This personal experience includes working with clients, both paying and *pro bono*, who wish to challenge state laws and regulations that are contrary to the First and Second Amendments.

13. The attached itemization of time spent by Clement & Murphy personnel representing Plaintiffs in this action is based on records made contemporaneously at the time the work was completed or the expense was incurred. *See* Exs.A-1, A-2. The itemization reflects the customary hourly rates charged by Clement & Murphy personnel in other hourly matters during the pendency of this litigation, and it reflects the time necessarily spent by Clement & Murphy personnel in this action. As set forth below and supported by Exhibit A-1, Plaintiffs request \$664,477.50 in attorney's fees, which represents a reasonable award in light of all the facts and circumstances surrounding Plaintiffs' successful constitutional challenge.

14. My work in this action included overseeing all filings before both this Court and the Second Circuit, including reviewing and revising drafts of filings, preparing for and participating in oral argument before this Court and the Second Circuit, and communicating with the client and co-counsel throughout. Plaintiffs seek \$173,712.50 for 96.75 hours of work performed by me during this litigation, an effective hourly billing rate of \$1,795.48. This was a reasonable rate in light of my level of experience and expertise.

15. From the inception of Clement & Murphy's work in this action, I personally supervised and managed the work of Clement & Murphy's attorneys and staff. I endeavored to keep the number of personnel assigned to this case to the minimum reasonably necessary to serve

Plaintiffs' needs efficiently. Likewise, I endeavored to make work assignments appropriate to each attorney's or paralegal's level of experience and expertise.

16. Clement & Murphy attorneys who performed services for Plaintiffs and for whose work Plaintiffs seek reimbursement in this application are listed below.

17. The first four attorneys listed below—Andrew C. Lawrence, Trevor W. Ezell, Nicholas M. Gallagher, and Kyle R. Eiswald—are the primary attorneys who worked on this matter, including the fee application.

18. **Andrew C. Lawrence.** Andrew Lawrence is a partner at Clement & Murphy. Mr. Lawrence graduated from Stanford Law School, J.D., in 2015 and Stanford University, B.A., with University Distinction and Departmental Honors, in 2010. He then served as a law clerk to the Honorable Paul V. Niemeyer of the U.S. Court of Appeals for the Fourth Circuit. Mr. Lawrence's legal practice has been devoted substantially to appellate and Supreme Court litigation as well as critical motions work. He has authored briefs before the U.S. Supreme Court, the federal courts of appeals, and federal district courts. His work has included other religious-liberty and Second Amendment cases such as *Kennedy*, 597 U.S. 507, *Little Sisters of the Poor Saints Peter & Paul Home v. Pennsylvania*, 140 S.Ct. 2367 (2020), and *Koons v. Platkin*, Nos. 23-1900, 23-2043 (3d Cir.) Mr. Lawrence was instrumental at all stages of this litigation, having reviewed, drafted, and revised the filings and assisted with oral argument preparation. Plaintiffs seek \$183,562.50 for 133.75 hours of work performed by Mr. Lawrence during this litigation, an effective hourly billing rate of \$1,372.43. This is a reasonable rate in light of Mr. Lawrence's level of experience and expertise.

19. **Trevor W. Ezell.** Trevor Ezell was an associate at Clement & Murphy through the end of 2022. Mr. Ezell graduated from Stanford Law School, J.D., in 2017, and Kenyon College,

B.A., in 2012. He then served as a law clerk to Justice Neil M. Gorsuch of the U.S. Supreme Court, to the Honorable Andrew S. Oldham of the U.S. Court of Appeals for the Fifth Circuit, and to the Honorable Jeffrey S. Sutton of the U.S. Court of Appeals for the Sixth Circuit. At Clement & Murphy, Mr. Ezell's legal practice was devoted substantially to appellate and Supreme Court litigation and critical motions work. He drafted briefs before the Supreme Court, the federal courts of appeals, and federal district courts. Mr. Ezell's work included other religious-liberty and Second Amendment cases, such as *National Shooting Sports Foundation v. Jennings*, No. 22-1499 (D. Del.), *Eyre v. Rosenblum*, No. 22-cv-1862 (D. Or.), and *Texas v. California*, No. 22O153 (U.S.). Mr. Ezell reviewed and revised the complaint and drafted preliminary injunction briefs, and he also conducted witness examination at the preliminary-injunction hearing, which required extensive work preparing Pastor Spencer for that experience. Plaintiffs seek \$118,932.50 for 105.25 hours of work performed by Mr. Ezell during this litigation, an effective hourly billing rate of \$1,130. This is a reasonable rate in light of Mr. Ezell's level of experience and expertise.

20. **Nicholas M. Gallagher.** Nicholas Gallagher was an associate at Clement & Murphy during this litigation. Mr. Gallagher graduated from New York University School of Law, J.D., *cum laude*, in 2019 and Oxford University, B.A., M.A. (Oxon.), in 2011. He then served as a law clerk to the Honorable Danny J. Boggs of the U.S. Court of Appeals for the Sixth Circuit. Mr. Gallagher's legal practice has been devoted substantially to appellate and Supreme Court litigation and critical motions works. He has drafted briefs before the Supreme Court, the federal courts of appeals, and federal district courts. His work has included other First and Second Amendment cases such as *Bruen*, 597 U.S. 1; *Duncan v. Bonta*, 19 F.4th 1087 (9th Cir. 2021) (en banc), 142 S.Ct. 2895 (2022), No. 23-55805 (9th Cir. Mar. 19, 2024) (en banc); *National Shooting Sports Foundation v. Attorney General of New Jersey*, 80 F.4th 215 (3d Cir. 2023); *Koons v.*

Platkin, Nos. 23-1900, 23-2043 (3d Cir.); *Association of New Jersey Rifle & Pistol Clubs, Inc. v. Platkin*, Nos. 24-2415, 24-2450, 24-2506 (3d Cir.). Mr. Gallagher is also intimately familiar with firearms history and has previously cross-examined expert witnesses on the subject. *See, e.g., Oregon Firearms Federation, Inc. v. Brown*, 644 F.Supp.3d 782 (D. Or. 2022). In this matter, Mr. Gallagher assisted with drafting the complaint and briefs, as well as with preparation for the oral arguments. Plaintiffs seek \$51,587.50 for 54.25 hours of work performed by Mr. Gallagher during this litigation, an effective hourly billing rate of \$950.92. This is a reasonable rate in light of Mr. Gallagher's level of experience and expertise.

21. **Kyle R. Eiswald.** Kyle Eiswald is an associate at Clement & Murphy. Mr. Eiswald graduated from Harvard Law School, J.D., *cum laude*, in 2023, from the Southern Baptist Theological Seminary, M.A., in 2020, from Appalachian State University, B.A., *summa cum laude*, in 2014. He then served as a law clerk to the Honorable Kevin C. Newsom of the U.S. Court of Appeals for the Eleventh Circuit. Mr. Eiswald has experience in First and Second Amendment cases religious liberty and free speech cases. In this matter, Mr. Eiswald helped prepare the application for attorney's fees. Plaintiffs seek \$18,062.50 for 21.25 hours of work performed by Mr. Eiswald during this litigation, an effective hourly billing rate of \$850. This is a reasonable rate in light of Mr. Eiswald's level of experience and expertise.

22. Other Clement & Murphy attorneys also provided critical assistance related to the oral arguments in this case, such as participation in moot courts.

23. **H. Bartow Farr.** Bartow Farr is a partner at Clement & Murphy. Mr. Farr graduated from Sandra Day O'Connor College of Law at Arizona State University, J.D., *summa cum laude*, in 1973, and Princeton University, B.A., in 1966. He then served as a law clerk to Justice William H. Rehnquist of the U.S. Supreme Court, as well as serving as Assistant to the

Solicitor General of the United States. Mr. Farr practiced at Onek, Klein & Farr and its successor firms, Klein, Farr, Smith & Taranto and Farr & Taranto from 1981 to 2013, before joining Bancroft PLLC, then Kirkland & Ellis, and Clement & Murphy. A veteran appellate practitioner, Mr. Farr has argued 32 cases before the Supreme Court. Mr. Farr provided moot court assistance for oral argument in this Court. Plaintiffs seek \$25,162.50 for 15.25 hours of work performed by Mr. Farr during this litigation, an effective hourly billing rate of \$1,650. This is a reasonable rate in light of Mr. Farr's level of experience and expertise.

24. **Matthew D. Rowen.** Matthew Rowen is a partner at Clement & Murphy. Mr. Rowen graduated from Harvard Law School, J.D., *magna cum laude*, in 2013 and Columbia University, B.A., *magna cum laude*, in 2009. He then served as a law clerk to the Honorable Paul J. Watford of the U.S. Court of Appeals for the Ninth Circuit and to the Honorable David J. Barron of the U.S. Court of Appeals for the First Circuit. Mr. Rowen's legal practice has been devoted substantially to appellate and Supreme Court litigation and critical motions work. He has drafted briefs before the Supreme Court, the federal courts of appeals, and federal district courts, and he has presented argument in several Second Amendment matters. Mr. Rowen provided moot court assistance in preparation for oral argument in this Court. Plaintiffs seek \$6,000 for 5 hours of work performed by Mr. Farr during this litigation, an effective hourly billing rate of \$1,200. This is reasonable in light of Mr. Rowen's level of experience and expertise.

25. **Harker Rhodes.** Harker Rhodes is a partner at Clement & Murphy. Mr. Rhodes graduated from Stanford Law School, J.D., in 2012 and Harvard College, A.B., *summa cum laude*, in 2009. He then served as a law clerk to Justice Anthony Kennedy of the U.S. Supreme Court, to the Honorable Robert A. Katzmann of the U.S. Court of Appeals for the Second Circuit, and to the Honorable Rya W. Zobel of the U.S. District Court for the District of Massachusetts. Mr.

Rhodes' legal practice has been devoted substantially to appellate and Supreme Court litigation and critical motions work. He has drafted briefs before the Supreme Court, the federal courts of appeals, and federal district courts, and he has presented argument in several federal courts as well. Mr. Rhodes provided moot court assistance in preparation for oral argument before the Second Circuit. Plaintiffs seek \$23,962.50 for 17.75 hours of work performed by Mr. Rhodes during this litigation, an effective hourly billing rate of \$1,350. This is a reasonable rate in light of Mr. Rhodes' level of experience and expertise.

26. **Mariel Brookins.** Mariel Brookins was an associate at Clement & Murphy until April 2024. Ms. Brookins graduated from the University of Michigan Law School, J.D., *cum laude*, in 2017, from Grand Valley State University, M.B.A., in 2011, and from Wheaton College, B.A., in 2009. She then served as a law clerk to the Honorable Amy Coney Barrett, then of the U.S. Courts of Appeals for the Seventh Circuit, and to the Honorable Kevin C. Newsom of the U.S. Court of Appeals for the Eleventh Circuit. Ms. Brookins practice focused on appellate and Supreme Court litigation. She drafted briefs before the Supreme Court, the federal courts of appeals, and federal district courts. Ms. Brookins provided moot court assistance in preparation for oral argument before the Second Circuit. Plaintiffs seek \$18,000 for 15 hours of work performed by Ms. Brookins during this litigation, an effective hourly billing rate of \$1,200. This is a reasonable rate in light of Ms. Brookins level of experience and expertise.

27. **Joseph J. DeMott.** Joeseeph DeMott is an associate at Clement & Murphy. Mr. DeMott graduated from Stanford Law School, J.D., in 2018, from Hebrew University of Jerusalem, M.A., *magna cum laude*, in 2012, and from the University of Notre Dame, B.A., *magna cum laude*, in 2010. Mr. DeMott previously served as a law clerk for the Honorable Judith W. Rogers of the U.S. Court of Appeals for the D.C. Circuit and spent three and a half years with the Civil Division

of the U.S. Department of Justice. Mr. DeMott's legal practice has been devoted to briefing and arguing complex legal issues at all levels of the federal system. Mr. DeMott provided moot court assistance in preparation for oral argument before the Second Circuit. Plaintiffs seek \$6,325.00 for 5.75 hours of work performed by Mr. DeMott during this litigation, an effective hourly billing rate of \$1,100. This is a reasonable rate in light of Mr. DeMott's level of experience and expertise.

28. **Chadwick J. Harper.** Chadwick Harper was an associate at Clement & Murphy until July 2024. Mr. Harper graduated from Harvard Law School, J.D., *cum laude*, in 2019, from Trinity College Dublin, MPhil, in 2015, and from Davidson College in 2013. He then served as a law clerk to the Honorable Kevin C. Newsom of the U.S. Court of Appeals for the Eleventh Circuit and the Honorable Andrew S. Oldham of the U.S. Court of Appeals for the Fifth Circuit. Mr. Harper's legal practice was devoted substantially to appellate and Supreme Court litigation. He drafted briefs before the Supreme Court, the federal courts of appeals, and federal district courts. Mr. Harper provided moot court assistance in preparation for oral argument in this Court. Plaintiffs seek \$9,225.00 for 10.25 hours of work performed by Mr. Harper during this litigation, an effective hourly billing rate of \$900. This was a reasonable rate in light of Mr. Harper's level of experience and expertise.

29. **Darina Merriam.** Darina Merriam is an associate at Clement & Murphy. Ms. Merriam graduated from Georgetown University Law Center, J.D., *magna cum laude*, in 2020 and from New York University Abu Dhabi, *summa cum laude*, in 2014. She then served as a law clerk to the Honorable Gregory G. Katsas of the U.S. Court of Appeals for the D.C. Circuit. Ms. Merriam's legal practice has been devoted substantially to appellate and Supreme Court litigation and critical motions work. She has drafted briefs before the Supreme Court, the federal courts of appeals, and federal district courts. Ms. Merriam provided moot court assistance in preparation

for oral argument in this Court. Plaintiffs seek \$5,600 for 7 hours of work performed by Ms. Merriam during this litigation, an effective hourly billing rate of \$800. This is a reasonable rate in light of Ms. Merriam's level of experience and expertise.

30. **Ilan J. Posner.** Ilan Posner was an associate at Clement & Murphy until September 2023. Mr. Posner graduated from Georgetown University Law Center, J.D., *magna cum laude*, in 2022 and from the University of Western Australia, B.A., in 2017. Mr. Posner is currently clerking for the Honorable Don R. Willett of the U.S. Court of Appeals for the Fifth Circuit and previously served as a law clerk for the Honorable Timothy J. Kelly of the U.S. District Court for the District of Columbia. Mr. Posner's legal practice has been devoted substantially to appellate litigation. He has drafted briefs before the federal courts of appeals and federal district courts. Mr. Posner provided moot court assistance in preparation for oral argument before the Second Circuit. Plaintiffs seek \$11,250.00 for 15 hours of work performed by Mr. Posner during this litigation, an effective hourly billing rate of \$750. This is a reasonable rate in light of Mr. Posner's level of experience and expertise.

31. The itemization also reflects the reasonable hourly rates and time that other professionals spent assisting with Plaintiffs' constitutional challenge. Those professionals who performed services for Plaintiffs and for whose work Plaintiffs seek reimbursement in this application are listed below.

32. **Ashley Britton.** Ashley Britton is a senior paralegal at Clement & Murphy. Ms. Britton graduated from California Western School of Law, J.D., in May 2015 and from San Diego State University, B.S., in May 2009. Ms. Britton is a member of the California Bar. An experienced paralegal with extensive experience specific to the U.S. Supreme Court, federal courts of appeals, and federal district courts, Ms. Britton has worked in this field, and with our team

specifically, for nearly a decade. Ms. Britton assisted in preparing motions, briefs, and appendices before this Court and the Second Circuit. Plaintiffs seek \$4,036.25 for 8.5 hours of work performed by Ms. Britton during this litigation, an effective hourly billing rate of \$474.85. This is a reasonable rate in light of Ms. Britton's level of experience and expertise.

33. **Aviana Vergnetti.** Aviana Vergnetti is a paralegal at Clement & Murphy. Ms. Vergnetti graduated from Boston University, B.A., in 2017. An experienced paralegal with extensive experience specific to the U.S. Supreme Court, federal courts of appeals, and federal district court, Ms. Vergnetti has worked in this field, and with our team specifically, for approximately five years. Ms. Vergnetti assisted in preparing filings, briefs, and appendices before this Court and the Second Circuit. Plaintiffs seek \$9,058.75 for 21.75 hours of work performed by Ms. Vergnetti during this litigation, an effective hourly billing rate of \$416.49. This was a reasonable rate in light of Ms. Vergnetti's level of experience and expertise.

34. As set forth above, Plaintiffs' successful prosecution of this action required litigation before this Court and the Second Circuit and centered on the First Amendment's Religion Clauses and the Second Amendment. This case therefore required appellate practitioners who are well-versed in these complex areas of constitutional law, which have undergone rapid development in recent years.

35. There are very few attorneys who regularly practice First Amendment religious-liberty law. There are even fewer who regularly practice both First and Second Amendment law. Even fewer regularly do so against governmental entities. No in-district counsel possessed the experience that Plaintiffs' constitutional challenges required. For that reason, Plaintiffs justifiably retained out-of-district counsel at Clement & Murphy with extensive experience litigating both

First Amendment religious-liberty and Second Amendment matters before the federal courts, including all the way up to the Supreme Court.

36. Clement & Murphy is located in the Washington, D.C. area. The hourly rates of Clement & Murphy's attorneys are consistent with the rates charged by other attorneys in Washington, D.C., and other major legal markets. *See, e.g.*, Dkt.224-2 at 4, *Franciscan All., Inc. v. Becerra*, No. 16-cv-108 (N.D. Tex. filed Dec. 23, 2022).

37. Clement & Murphy is also justified in charging its rates, as it is widely considered one of the top law firms in the country. Clement & Murphy is one of just six law firms recognized within "Band 1" of Chambers & Partners' nationwide "Appellate Law" rankings. *See* Chambers & Partners, *Appellate Law | USA*, <https://rebrand.ly/5d75fx8>. We are regularly featured on National Law Journal's "Appellate Hot List," *see, e.g.*, Victoria Ostrander, *Finalists Announced for the National Law Journal Legal Awards 2024*, Nat'l L. J. (Aug. 22, 2024), <https://archive.ph/FnT4Q> (recognizing Clement & Murphy on "Appellate Hot List"), and recognized by Law360 as one of the best appellate groups in the country, *see, e.g.*, Steven Lerner, *Appellate Group of the Year: Clement & Murphy*, Law360 (Feb. 11, 2025), <https://rebrand.ly/cqy6aya>.

38. Clement & Murphy's customary hourly rates reflect what a reasonable, paying client would be willing to pay. Indeed, these customary hourly rates reflect what Clement & Murphy's clients did, in fact, pay in other matters during the course of this litigation.

39. The number of hours worked in this case—which encompasses the filing of a complaint, drafting a motion for preliminary injunction, presenting a district court argument, preparing appellate briefing, and presenting oral argument on appeal, among other things—is consistent with both Clement & Murphy's general practice and general industry practice.

40. Clement & Murphy is a small firm. At various times during the course of this action, its size has ranged from approximately 10 to 15 attorneys and two to four other professionals. And its services are in demand. This case took up a substantial proportion of the firm's time, *see* Ex.A-1, which we could and would have devoted to other, paying matters. This action also imposed substantial time constraints on attorneys' schedules, as the case proceeded quickly through this Court and the Second Circuit—over a period encompassing the end-of-year holidays. Indeed, only five months elapsed between the time of the filing of complaint in this Court and the oral argument in the Second Circuit.

41. Plaintiffs are entitled to recover attorney's fees for Clement & Murphy's work by multiplying the number of hours reasonably expended on the litigation by a reasonable hourly rate for Clement & Murphy's attorneys and professionals. Here, that product is \$664,477.50.

42. During the course of this litigation, Clement & Murphy also incurred various out-of-pocket expenses. As the attached itemization shows, those out-of-pocket expenses relate to travel to Buffalo and New York City for court appearances or otherwise relate to fees associated with court documents. Those are fees that Clement & Murphy ordinarily charges to clients. Accordingly, in addition to Clement & Murphy's attorney's fees, Plaintiffs also seek \$1,768.84 to reimburse Clement & Murphy's costs.

43. I submit that the request for \$666,246.34 for services rendered—\$664,477.50 in attorney's fees and \$1,768.84 in costs, as outlined in Exhibits A-1 and A-2—is reasonable in light of all the facts and circumstances surrounding the Plaintiffs' challenge and the lawsuit, which resulted in judgment in the Plaintiffs' favor by this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 18, 2025.

Erin E. Murphy

A handwritten signature in blue ink, appearing to read "Erin E. Murphy", with a long horizontal flourish extending to the right.

Exhibit A-1



















Clement & Murphy Attorney's Fees

Attorney	Fees
Erin Murphy	\$173,712.50
Andrew Lawrence	\$183,562.50
Trevor Ezell	\$118,932.50
Nicholas Gallagher	\$51,587.50
Kyle Eiswald	\$18,062.50
Bartow Farr	\$25,162.50
Matthew Rowen	\$6,000
Harker Rhodes	\$23,962.50
Mariel Brookins	\$18,000
Joseph DeMott	\$6,325.00
Chadwick Harper	\$9,225.00
Darina Merriam	\$5,600
Ilan Posner	\$11,250.00
Ashley Britton	\$4,036.25
Aviana Vergnetti	\$9,058.75
GRAND TOTAL	\$664,477.50

Activities Export

02/18/2025









5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/21/2022		Prepare for and attend strategy call with First Liberty.  Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.25h	\$900.00	\$1,125.00	-
10/21/2022		Participate in introductory telephone conference re case.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,150.00	\$575.00	-
10/21/2022		Prepare for and participate in team call with First Liberty to discuss filing strategy and legal arguments in challenge to S51001.  Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	1.00h	\$1,130.00	\$1,130.00	-
10/27/2022		Perform research re and edit complaint.  Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.25h	\$900.00	\$1,125.00	-
10/29/2022		Exchange emails re lawsuit.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,750.00	\$437.50	-
10/29/2022		Revise draft complaint.  Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	2.00h	\$1,130.00	\$2,260.00	-
10/30/2022		Revise draft complaint; exchange emails re same.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	2.00h	\$1,750.00	\$3,500.00	-
10/30/2022		Revise draft complaint.  Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	2.75h	\$1,130.00	\$3,107.50	-
10/31/2022		Call to plan case with First Liberty Institute.  Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.50h	\$900.00	\$450.00	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

02/18/2025

5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/31/2022		Prepare for and participate in conference call with co-counsel re filing logistics. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	1.00h	\$1,750.00	\$1,750.00	-
10/31/2022		Review and analyze draft complaint; prepare for and participate in telephone conference with co-counsel re same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	1.00h	\$1,150.00	\$1,150.00	-
10/31/2022		Research draft complaint; participate in team call with First Liberty to discuss deadline to file/pro hac logistics. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	2.50h	\$1,130.00	\$2,825.00	-
11/01/2022		Review draft complaint. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.50h	\$900.00	\$450.00	-
11/01/2022		Revise draft complaint; exchange emails re local counsel. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	2.50h	\$1,750.00	\$4,375.00	-
11/01/2022		Research and revise draft complaint; coordinate filing/pro hac logistics; revise draft PI brief. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	6.00h	\$1,130.00	\$6,780.00	-
11/02/2022		Exchange emails re complaint and pro hac papers. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.50h	\$1,750.00	\$875.00	-
11/02/2022		Research district/division question for filing logistics; revise draft	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	6.50h	\$1,130.00	\$7,345.00	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		affidavits and complaint; outline thoughts on nominal damages. ● Non-billable						
11/03/2022	🕒	Exchange emails with co-counsel re pro hac vice application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,150.00	\$287.50	-
11/03/2022	🕒	Exchange emails re finalization of complaint. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	1.00h	\$1,750.00	\$1,750.00	-
11/04/2022	🕒	Review and analyze PI decision in Hardaway case. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.75h	\$1,150.00	\$862.50	-
11/04/2022	🕒	Research and revise draft preliminary injunction brief. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	10.75h	\$1,130.00	\$12,147.50	-
11/05/2022	🕒	Exchange emails re PI brief. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,750.00	\$437.50	-
11/05/2022	🕒	Research and revise draft preliminary injunction brief. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	7.50h	\$1,130.00	\$8,475.00	-
11/06/2022	🕒	Revise draft PI brief. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	8.00h	\$1,750.00	\$14,000.00	-
11/06/2022	🕒	Research colonial statutes; revise draft preliminary injunction brief with E. Murphy's edits. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	5.00h	\$1,130.00	\$5,650.00	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/07/2022	 	Revise PI brief. Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	1.00h	\$1,750.00	\$1,750.00	-
11/07/2022	 	Cite check memorandum in support of PI motion; code and generate tables. Non-billable	His Tabernacle Church Client v. Nigrelli	Aviana Vergnetti	5.75h	\$405.00	\$2,328.75	-
11/07/2022	 	Revise, citecheck, and proof preliminary injunction brief for filing; review Atonyuk opinion. Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	9.50h	\$1,130.00	\$10,735.00	-
11/14/2022	 	Attend group strategy call. Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.75h	\$900.00	\$675.00	-
11/14/2022	 	Prepare for preliminary conference; conference call with team re same. Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	1.25h	\$1,750.00	\$2,187.50	-
11/14/2022	 	Participate in telephone conference re preliminary conference and case strategy. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.75h	\$1,150.00	\$862.50	-
11/14/2022	 	Assist E. Murphy with preparations for court appearance. Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$900.00	\$225.00	-
11/14/2022	 	Prepare for initial case conference. Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	2.00h	\$1,130.00	\$2,260.00	-
11/15/2022	 	Prepare for and participate in status conference.	His Tabernacle Church Client v. Nigrelli	Erin Murphy	1.75h	\$1,750.00	\$3,062.50	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
11/15/2022	🕒	Attend status hearing; debrief with team. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.25h	\$900.00	\$1,125.00	-
11/15/2022	🕒	Attend initial case conference ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	1.00h	\$1,130.00	\$1,130.00	-
11/22/2022	🕒	Discuss potential amicus brief with potential amicus. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.50h	\$1,750.00	\$875.00	-
11/28/2022	🕒	Discuss upcoming hearing and briefing schedule with N. Gallagher ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	0.50h	\$1,130.00	\$565.00	-
12/06/2022	🕒	Review of related cases. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.00h	\$900.00	\$900.00	-
12/06/2022	🕒	Exchange emails re stay briefing status. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,750.00	\$437.50	-
12/07/2022	🕒	Exchange emails re reply brief. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,750.00	\$437.50	-
12/07/2022	🕒	Review opposition. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$900.00	\$225.00	-
12/07/2022	🕒	Review and annotate NY's Tabernacle PI response ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	1.00h	\$1,130.00	\$1,130.00	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

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5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/08/2022	 Non-billable	Discuss reply brief with T. Ezell.	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,750.00	\$437.50	-
12/08/2022	 Non-billable	Perform historical research.	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.50h	\$900.00	\$450.00	-
12/08/2022	 Non-billable	Discuss Tabernacle PI reply historical question with E. Murphy and N. Gallagher	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	0.75h	\$1,130.00	\$847.50	-
12/09/2022	 Non-billable	Perform historical research re reply.	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.50h	\$900.00	\$1,350.00	-
12/12/2022	 Non-billable	Draft PI reply.	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	5.25h	\$1,130.00	\$5,932.50	-
12/13/2022	 Non-billable	Review reply draft.	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.25h	\$900.00	\$1,125.00	-
12/13/2022	 Non-billable	Revise reply brief.	His Tabernacle Church Client v. Nigrelli	Erin Murphy	4.50h	\$1,750.00	\$7,875.00	-
12/13/2022	 Non-billable	Review and analyze PI briefing; review and analyze briefing and orders in Hardaway; exchange emails re same.	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	3.50h	\$1,150.00	\$4,025.00	-
12/13/2022	 Non-billable	Draft and edit PI reply; review Everytown amicus brief.	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	7.50h	\$1,130.00	\$8,475.00	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/14/2022	 	Revise draft reply brief. Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	6.75h	\$1,750.00	\$11,812.50	-
12/14/2022	 	Prepare moot materials; review and edit reply. Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.00h	\$900.00	\$900.00	-
12/14/2022	 	Review and analyze revised reply brief. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,150.00	\$575.00	-
12/14/2022	 	Prepare for moot. Non-billable	His Tabernacle Church Client v. Nigrelli	Chadwick Harper	0.75h	\$900.00	\$675.00	-
12/14/2022	 	Revise draft PI reply; schedule moot. Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	3.00h	\$1,130.00	\$3,390.00	-
12/15/2022	 	Prepare for moot. Non-billable	His Tabernacle Church Client v. Nigrelli	Chadwick Harper	1.00h	\$900.00	\$900.00	-
12/15/2022	 	Review First Liberty edits to reply brief. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,150.00	\$575.00	-
12/15/2022	 	Work on issues for moot court. Non-billable	His Tabernacle Church Client v. Nigrelli	Bartow Farr	1.50h	\$1,650.00	\$2,475.00	-
12/15/2022	 	Exchange emails re edits to reply brief. Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,750.00	\$437.50	-
12/15/2022	 	Cite check response brief. Non-billable	His Tabernacle Church Client v. Nigrelli	Aviana Vergnetti	1.75h	\$405.00	\$708.75	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/15/2022	 Non-billable	Assist in cite checking reply brief.	His Tabernacle Church Client v. Nigrelli	Ashley Britton	1.50h	\$460.00	\$690.00	-
12/15/2022	 Non-billable	Revise draft Tabernacle PI reply	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	0.50h	\$1,130.00	\$565.00	-
12/16/2022	 Non-billable	Revise draft reply brief.	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.75h	\$1,750.00	\$1,312.50	-
12/16/2022	 Non-billable	Prepare for moot.	His Tabernacle Church Client v. Nigrelli	Chadwick Harper	3.50h	\$900.00	\$3,150.00	-
12/16/2022	 Non-billable	Proofread reply.	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.50h	\$900.00	\$450.00	-
12/16/2022	 Non-billable	Work on issues for moot court.	His Tabernacle Church Client v. Nigrelli	Bartow Farr	3.00h	\$1,650.00	\$4,950.00	-
12/16/2022	 Non-billable	Review final reply brief.	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,150.00	\$287.50	-
12/16/2022	 Non-billable	Code and generate tables of contents and authorities.	His Tabernacle Church Client v. Nigrelli	Aviana Vergnetti	0.50h	\$405.00	\$202.50	-
12/16/2022	 Non-billable	Proof PI reply; draft Spencer outline; file brief.	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	2.00h	\$1,130.00	\$2,260.00	-
12/17/2022	 Non-billable	Work on issues for moot court.	His Tabernacle Church Client v. Nigrelli	Bartow Farr	2.00h	\$1,650.00	\$3,300.00	-
12/18/2022	 Non-billable	Review case materials to prepare for moot.	His Tabernacle Church Client v. Nigrelli	Darina Merriam	1.25h	\$800.00	\$1,000.00	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
12/19/2022	🕒	Prepare for argument. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	10.00h	\$1,750.00	\$17,500.00	-
12/19/2022	🕒	Assist E. Murphy with research and preparations for oral argument. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	3.00h	\$900.00	\$2,700.00	-
12/19/2022	🕒	Attend status conference. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.75h	\$900.00	\$675.00	-
12/19/2022	🕒	Review preliminary-injunction reply brief. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Chadwick Harper	0.50h	\$900.00	\$450.00	-
12/19/2022	🕒	Prepare for moot court. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Bartow Farr	3.00h	\$1,650.00	\$4,950.00	-
12/19/2022	🕒	Review case materials to prepare for moot. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Darina Merriam	1.00h	\$800.00	\$800.00	-
12/19/2022	🕒	Prepare for moot court. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Bartow Farr	2.75h	\$1,650.00	\$4,537.50	-
12/19/2022	🕒	Discuss legal strategy for PI arguments with E. Murphy and N. Gallagher; attend remote status conference; review PI pleadings and draft Spencer outline. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	3.50h	\$1,130.00	\$3,955.00	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/20/2022	 Non-billable	Prepare for moot, attend moot; edit deposition notes for T. Ezell.	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	6.75h	\$900.00	\$6,075.00	-
12/20/2022	 Non-billable	Prepare for moot; participate in moot.	His Tabernacle Church Client v. Nigrelli	Chadwick Harper	4.50h	\$900.00	\$4,050.00	-
12/20/2022	 Non-billable	Compile case documents for moot court.	His Tabernacle Church Client v. Nigrelli	Aviana Vergnetti	1.25h	\$405.00	\$506.25	-
12/20/2022	 Non-billable	Attend moot court.	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	1.00h	\$1,150.00	\$1,150.00	-
12/20/2022	 Non-billable	Prepare for and participate in moot; debrief.	His Tabernacle Church Client v. Nigrelli	Matthew Rowen	5.00h	\$1,200.00	\$6,000.00	-
12/20/2022	 Non-billable	Prepare for and participate in moot court.	His Tabernacle Church Client v. Nigrelli	Erin Murphy	6.00h	\$1,750.00	\$10,500.00	-
12/20/2022	 Non-billable	Review case materials; participate in moot.	His Tabernacle Church Client v. Nigrelli	Darina Merriam	4.75h	\$800.00	\$3,800.00	-
12/20/2022	 Non-billable	Complete preparation for moot court; participate in moot court and following discussion.	His Tabernacle Church Client v. Nigrelli	Bartow Farr	3.00h	\$1,650.00	\$4,950.00	-
12/20/2022	 Non-billable	Attend moot for PI argument; draft Spencer outline.	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	7.75h	\$1,130.00	\$8,757.50	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
12/21/2022	🕒	Prepare for hearing. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	3.00h	\$1,750.00	\$5,250.00	-
12/21/2022	🕒	Revise draft Spencer outline; meet with R. Gardner and M. Spencer; hearing prep with co-counsel; review outline and print hard copies of documents for hearing. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	7.75h	\$1,130.00	\$8,757.50	-
12/22/2022	🕒	Attend MPI hearing remotely. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	2.75h	\$900.00	\$2,475.00	-
12/22/2022	🕒	Prepare for and participate in hearing. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	4.50h	\$1,750.00	\$7,875.00	-
12/22/2022	🕒	Prep for PI hearing; attend PI hearing. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	6.00h	\$1,130.00	\$6,780.00	-
12/26/2022	🕒	Exchange emails re stay pending appeal. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.50h	\$1,750.00	\$875.00	-
12/26/2022	🕒	Draft proposed stay language for NY counsel. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	0.75h	\$1,130.00	\$847.50	-
12/27/2022	🕒	Confer local rules re notice of appearance requirement; register T. Ezell for electronic filing in local district court.	His Tabernacle Church Client v. Nigrelli	Ashley Britton	0.50h	\$460.00	\$230.00	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
12/27/2022	🕒	Draft and discuss potential stay language with NY counsel. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	1.25h	\$1,130.00	\$1,412.50	-
12/29/2022	🕒	Review opinion. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$900.00	\$225.00	-
12/29/2022	🕒	Review district court opinion granting PI. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	1.25h	\$1,130.00	\$1,412.50	-
01/04/2023	🕒	Review local rules re required case forms and deadlines for same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Ashley Britton	0.50h	\$460.00	\$230.00	-
01/04/2023	🕒	Exchange emails with potential amicus. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,750.00	\$437.50	-
01/06/2023	🕒	Review and revise notices of appearance for E. Murphy and A. Lawrence; exchange emails re same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Ashley Britton	0.25h	\$460.00	\$115.00	-
01/06/2023	🕒	Exchange emails with A. Britton re Second Circuit notices of appearances. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,150.00	\$287.50	-
01/09/2023	🕒	Finalize and file notices of appearance for E. Murphy and A. Lawrence; refile A. Lawrence	His Tabernacle Church Client v. Nigrelli	Ashley Britton	0.50h	\$460.00	\$230.00	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		notice of appearance. ● Non-billable						
01/09/2023	🕒	Exchange emails with A. Britton re Second Circuit notices of appearance. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,150.00	\$287.50	-
01/09/2023	🕒	Discuss appeal schedule with N. Gallagher. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,750.00	\$437.50	-
01/11/2023	🕒	Discuss appeal with E. Murphy. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$900.00	\$225.00	-
01/13/2023	🕒	Prepare and format motion to consolidate template. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Ashley Britton	0.50h	\$460.00	\$230.00	-
01/13/2023	🕒	Exchange emails with E. Murphy and N. Gallagher re oral argument date. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,150.00	\$575.00	-
01/14/2023	🕒	Draft emergency motion to consolidate. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.25h	\$900.00	\$1,125.00	-
01/15/2023	🕒	Edit and revise motion to expedite briefing and oral argument; exchange emails with N. Gallagher re same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	1.50h	\$1,150.00	\$1,725.00	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/17/2023		Exchange emails re consolidation and expedition motion; revise same.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.75h	\$1,750.00	\$1,312.50	-
01/17/2023		Format motion to set expedited briefing schedule; edit same; phone call with A. Vergnetti re filing motion and exhibits.  Non-billable	His Tabernacle Church Client v. Nigrelli	Ashley Britton	0.50h	\$460.00	\$230.00	-
01/17/2023		Edit and revise motion to expedite; coordinate filing of same.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.75h	\$1,150.00	\$862.50	-
01/23/2023		Plan briefing with A. Lawrence; review Charles article.  Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.50h	\$950.00	\$475.00	-
01/26/2023		Exchange emails with N. Gallagher re PI hearing transcript.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,350.00	\$337.50	-
01/30/2023		Participate in Heritage amicus call.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.50h	\$1,850.00	\$925.00	-
01/30/2023		Prepare and format response brief template.  Non-billable	His Tabernacle Church Client v. Nigrelli	Ashley Britton	0.50h	\$485.00	\$242.50	-
01/31/2023		Prepare oral argument acknowledgment form.  Non-billable	His Tabernacle Church Client v. Nigrelli	Ashley Britton	0.25h	\$485.00	\$121.25	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

Activities Export

02/18/2025





















5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/01/2023		Finalize and file hearing date acknowledgment form.  Non-billable	His Tabernacle Church Client v. Nigrelli	Ashley Britton	0.25h	\$485.00	\$121.25	-
02/02/2023		Exchange emails re proposed amended legislation.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
02/02/2023		Review joint appendix.  Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.50h	\$950.00	\$475.00	-
02/02/2023		Review draft JA and exchange emails re same.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,350.00	\$675.00	-
02/03/2023		Review PI hearing transcript; conduct legal research for Second Circuit brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	4.00h	\$1,350.00	\$5,400.00	-
02/05/2023		Exchange emails with amicus.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
02/05/2023		Draft response brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	2.50h	\$1,350.00	\$3,375.00	-
02/06/2023		Draft brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	7.50h	\$1,350.00	\$10,125.00	-
02/07/2023		Exchange email re response brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
02/07/2023		Draft response brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	6.50h	\$1,350.00	\$8,775.00	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

02/18/2025























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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/08/2023	 	Draft response. Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$950.00	\$237.50	-
02/08/2023	 	Draft repsonse brief. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	7.00h	\$1,350.00	\$9,450.00	-
02/09/2023	 	Draft response brief. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	8.50h	\$1,350.00	\$11,475.00	-
02/10/2023	 	Draft inserts for response. Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.75h	\$950.00	\$1,662.50	-
02/11/2023	 	Draft response brief. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	7.50h	\$1,350.00	\$10,125.00	-
02/13/2023	 	Revise brief with A. Lawrence. Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.50h	\$950.00	\$475.00	-
02/13/2023	 	Review state's brief; discuss same with co-counsel. Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.50h	\$1,850.00	\$925.00	-
02/13/2023	 	Draft brief; telephone conference with C&M and FLI teams re response brief. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	8.50h	\$1,350.00	\$11,475.00	-
02/14/2023	 	Draft response brief. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	7.50h	\$1,350.00	\$10,125.00	-
02/16/2023	 	Edit and revise response brief; exchange emails with N. Gallagher re same. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	7.50h	\$1,350.00	\$10,125.00	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

02/18/2025





















5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/16/2023		Format signature blocks on response brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Ashley Britton	0.25h	\$485.00	\$121.25	-
02/17/2023		Edit and revise response brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	3.50h	\$1,350.00	\$4,725.00	-
02/22/2023		Revise draft brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	4.50h	\$1,850.00	\$8,325.00	-
02/23/2023		Revise draft response brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	1.50h	\$1,850.00	\$2,775.00	-
02/24/2023		Revise draft brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	1.50h	\$1,850.00	\$2,775.00	-
02/25/2023		Revise and circulate draft brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	1.25h	\$1,850.00	\$2,312.50	-
02/25/2023		Edit draft.  Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.50h	\$950.00	\$1,425.00	-
02/26/2023		Cite check response brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Aviana Vergnetti	6.50h	\$425.00	\$2,762.50	-
02/27/2023		Cite check response brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Aviana Vergnetti	4.75h	\$425.00	\$2,018.75	-
02/27/2023		Edit and revise response brief.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	1.25h	\$1,350.00	\$1,687.50	-
02/27/2023		Proofread draft.  Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	2.50h	\$950.00	\$2,375.00	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

02/18/2025

5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/28/2023	 	Finalize and file response brief. Non-billable	His Tabernacle Church Client v. Nigrelli	Aviana Vergnetti	0.75h	\$425.00	\$318.75	-
02/28/2023	 	Proofread brief; edit and revise same; coordinate filing of same. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	3.00h	\$1,350.00	\$4,050.00	-
02/28/2023	 	Draft oral argument form. Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$950.00	\$237.50	-
02/28/2023	 	Generate and format table of contents and table of authorities on response brief; format cover and signature block. Non-billable	His Tabernacle Church Client v. Nigrelli	Ashley Britton	2.25h	\$485.00	\$1,091.25	-
03/03/2023	 	Review appellate briefing. Non-billable	His Tabernacle Church Client v. Nigrelli	Harker Rhodes	1.00h	\$1,350.00	\$1,350.00	-
03/04/2023	 	Coordinate moot. Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.50h	\$950.00	\$475.00	-
03/06/2023	 	Exchange emails re moot court. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,350.00	\$337.50	-
03/06/2023	 	Review appellate briefing. Non-billable	His Tabernacle Church Client v. Nigrelli	Harker Rhodes	1.25h	\$1,350.00	\$1,687.50	-
03/07/2023	 	Review appellate briefing; draft moot questions. Non-billable	His Tabernacle Church Client v. Nigrelli	Harker Rhodes	1.75h	\$1,350.00	\$2,362.50	-
03/08/2023	 	Review and analyze relevant cases; prepare moot questions.	His Tabernacle Church Client v. Nigrelli	Harker Rhodes	2.75h	\$1,350.00	\$3,712.50	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

02/18/2025

5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
03/08/2023	🕒	Exchange emails re arguments. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
03/09/2023	🕒	Review amicus briefs. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.75h	\$1,350.00	\$1,012.50	-
03/09/2023	🕒	Background research on case briefing. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Ilan Posner	1.25h	\$750.00	\$937.50	-
03/09/2023	🕒	Review and analyze relevant cases; review and analyze district court decision below and district court decisions in associated cases. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Harker Rhodes	3.00h	\$1,350.00	\$4,050.00	-
03/10/2023	🕒	Prepare for moot. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Ilan Posner	2.00h	\$750.00	\$1,500.00	-
03/10/2023	🕒	Review reply. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.00h	\$950.00	\$950.00	-
03/10/2023	🕒	Review reply brief. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	1.00h	\$1,350.00	\$1,350.00	-
03/10/2023	🕒	Review relevant cases; draft moot questions. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Harker Rhodes	4.50h	\$1,350.00	\$6,075.00	-
03/13/2023	🕒	Reviewed briefs in preparation for moot of CA2 oral argument.	His Tabernacle Church Client v. Nigrelli	Joseph DeMott	3.25h	\$1,100.00	\$3,575.00	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

Activities Export

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5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
03/13/2023	🕒	Prepare for moot. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Ilan Posner	2.00h	\$750.00	\$1,500.00	-
03/13/2023	🕒	Work on issues for moot. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Mariel Brookins	0.50h	\$1,200.00	\$600.00	-
03/13/2023	🕒	Review reply brief and relevant cases; draft moot questions. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Harker Rhodes	1.00h	\$1,350.00	\$1,350.00	-
03/14/2023	🕒	Work on issues for moot. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Mariel Brookins	2.00h	\$1,200.00	\$2,400.00	-
03/15/2023	🕒	Work on issues for moot. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Mariel Brookins	4.50h	\$1,200.00	\$5,400.00	-
03/15/2023	🕒	Prepare for argument. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	3.50h	\$1,850.00	\$6,475.00	-
03/15/2023	🕒	Prepare for oral argument. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$950.00	\$237.50	-
03/15/2023	🕒	Compile case documents for E. Murphy moot. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Aviana Vergnetti	0.50h	\$425.00	\$212.50	-
03/15/2023	🕒	Prepare for moot. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Ilan Posner	0.75h	\$750.00	\$562.50	-
03/15/2023	🕒	Exchange emails re moot court. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,350.00	\$337.50	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

Activities Export

02/18/2025

5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/16/2023	 Non-billable	Work on issues for moot.	His Tabernacle Church Client v. Nigrelli	Marisel Brookins	8.00h	\$1,200.00	\$9,600.00	-
03/16/2023	 Non-billable	Prepare and participate in moot.	His Tabernacle Church Client v. Nigrelli	Ilan Posner	5.25h	\$750.00	\$3,937.50	-
03/16/2023	 Non-billable	Review briefs and prepare questions in advance of moot for CA2 argument; participate in moot for CA2 argument.	His Tabernacle Church Client v. Nigrelli	Joseph DeMott	2.50h	\$1,100.00	\$2,750.00	-
03/16/2023	 Non-billable	Prepare for and moot E. Murphy.	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	3.50h	\$950.00	\$3,325.00	-
03/16/2023	 Non-billable	Prepare for and participate in moot court.	His Tabernacle Church Client v. Nigrelli	Erin Murphy	7.00h	\$1,850.00	\$12,950.00	-
03/16/2023	 Non-billable	Prepare for and attend moot court.	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	2.50h	\$1,350.00	\$3,375.00	-
03/16/2023	 Non-billable	Prepare for and participate in moot.	His Tabernacle Church Client v. Nigrelli	Harker Rhodes	2.50h	\$1,350.00	\$3,375.00	-
03/17/2023	 Non-billable	Research and draft memo on past decisions by the assigned panel.	His Tabernacle Church Client v. Nigrelli	Ilan Posner	3.75h	\$750.00	\$2,812.50	-
03/17/2023	 Non-billable	Review memo re panel's First Amendment cases; exchange emails re same; exchange emails with J. Dys re moot questions.	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,350.00	\$675.00	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

Activities Export

02/18/2025

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
03/18/2023	🕒	Revise opening. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
03/19/2023	🕒	Prepare for argument. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	6.50h	\$1,850.00	\$12,025.00	-
03/19/2023	🕒	Review Everytown amicus brief; exchange emails re same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.75h	\$1,350.00	\$1,012.50	-
03/20/2023	🕒	Listen to oral argument. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	2.00h	\$950.00	\$1,900.00	-
03/20/2023	🕒	Listen to oral arguments. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	2.00h	\$1,350.00	\$2,700.00	-
03/20/2023	🕒	Prepare for and present argument. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	3.50h	\$1,850.00	\$6,475.00	-
05/06/2023	🕒	Analyze state 28(j) letter. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$950.00	\$237.50	-
05/07/2023	🕒	Email team re 28(j) letter. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$950.00	\$237.50	-
05/07/2023	🕒	Exchange emails re 28(j) letter. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
05/10/2023	🕒	Participate in conference call re 28(j) response. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

Activities Export

02/18/2025



















5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/15/2023	 	Draft 28(j) response. Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.75h	\$950.00	\$712.50	-
05/15/2023	 	Revise 28(j) response. Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.75h	\$1,850.00	\$1,387.50	-
05/15/2023	 	Review and edit 28(j) letter; correspond re same. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,350.00	\$337.50	-
05/16/2023	 	Coordinate filing of 28(j) response. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,350.00	\$337.50	-
05/16/2023	 	Finalize and file 28j response letter. Non-billable	His Tabernacle Church Client v. Nigrelli	Ashley Britton	0.25h	\$485.00	\$121.25	-
07/06/2023	 	Discuss Goldstein decision with counsel in companion case. Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
07/06/2023	 	Review Goldstein and Maryland Shall Issue decisions; summarize for E. Murphy. Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	2.00h	\$950.00	\$1,900.00	-
07/06/2023	 	Review emails re Goldstein decision. Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,350.00	\$337.50	-
07/07/2023	 	Review summary of opinion in related case. Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

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5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/17/2023		Correspond re Bondi en banc development.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,350.00	\$675.00	-
12/08/2023		Review decision; exchange emails re same.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.50h	\$1,850.00	\$925.00	-
12/08/2023		Review opinion; correspond with C&M team re same.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	1.50h	\$1,350.00	\$2,025.00	-
12/11/2023		Exchange emails re next steps.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
12/12/2023		Discuss next steps with co-counsel.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.50h	\$1,850.00	\$925.00	-
12/13/2023		Exchange emails re AG outreach.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
12/14/2023		Discuss next steps with AG's office.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
12/20/2023		Exchange emails re scope of injunction.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,850.00	\$462.50	-
12/20/2023		Correspond with E. Murphy re scope of injunctive relief issue.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,350.00	\$337.50	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

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5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/02/2024		Review docket order re mandate issuance.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
01/05/2024		Follow-up call with state about next steps.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,950.00	\$487.50	-
01/05/2024		Correspond re fee issues.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
01/05/2024		Attend conference with state.  Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$1,100.00	\$275.00	-
01/07/2024		Research re fees decision.  Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$1,100.00	\$275.00	-
01/13/2024		Correspond re joint status report.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
01/17/2024		Correspond re fees.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
01/19/2024		Calculate attorneys fees.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,450.00	\$725.00	-
01/22/2024		Correspond with E. Murphy and N. Gallagher re fee application.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
01/24/2024		Correspond with N. Gallagher re fee application.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

02/18/2025



















5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/02/2024		Participate in status conference. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,950.00	\$487.50	-
02/07/2024		Legal research for fee application; correspond with E. Murphy re same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	1.50h	\$1,450.00	\$2,175.00	-
03/20/2024		Telephone conference with A. Lawrence re final order. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,950.00	\$487.50	-
03/20/2024		Telephone conference with E. Murphy re final order. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
03/21/2024		Review correspondene re final order. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
03/26/2024		Review stipulated order; edit and revise same; correspond re same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.75h	\$1,450.00	\$1,087.50	-
03/26/2024		Edit stipulated judgment. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.50h	\$1,100.00	\$550.00	-
04/05/2024		Exchange emails re proposed judgment. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,950.00	\$487.50	-
08/07/2024		Review Second Circuit orders; correspond re same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,450.00	\$725.00	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

02/18/2025










5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/08/2024		Exchange emails re supplemental briefing order.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,950.00	\$487.50	-
08/08/2024		Correspond re supplemental briefing.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
08/09/2024		Telephone conference with state re supplemental briefing; correspond re same.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,450.00	\$725.00	-
08/09/2024		Exchange emails re response to CA2 order.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,950.00	\$487.50	-
08/29/2024		Attention to supplemental brief issues.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,450.00	\$725.00	-
08/30/2024		Review Second Circuit order.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
10/24/2024		Edit and revise stipulated order; correspond re same.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,450.00	\$725.00	-
10/25/2024		Review dismissal order; exchange emails re same.  Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$1,950.00	\$487.50	-
10/25/2024		Correspond re fee application.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

02/18/2025

5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/05/2024		Correspond re fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,450.00	\$725.00	-
11/06/2024		Correspond with A. Lawrence re application to recover attorney's fees. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	0.25h	\$850.00	\$212.50	-
11/06/2024		Exchange emails re fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$1,100.00	\$275.00	-
11/06/2024		Attention to attorneys fees application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	1.00h	\$1,450.00	\$1,450.00	-
11/07/2024		Attention to attorneys fees application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	1.50h	\$1,450.00	\$2,175.00	-
11/18/2024		Correspond with K. Eiswald re fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
11/25/2024		Correspond re final order and fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,450.00	\$725.00	-
11/26/2024		Research and draft motion for attorney's fees. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	2.75h	\$850.00	\$2,337.50	-
11/27/2024		Draft memorandum of law in support of motion for attorney's fees.	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	2.00h	\$850.00	\$1,700.00	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

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Activities Export

02/18/2025
















5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable						
11/28/2024	🕒	Draft motion for attorney's fees. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	1.25h	\$850.00	\$1,062.50	-
11/29/2024	🕒	Draft motion for attorney's fees. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	4.50h	\$850.00	\$3,825.00	-
11/30/2024	🕒	Draft motion for attorney's fees. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	1.50h	\$850.00	\$1,275.00	-
12/02/2024	🕒	Draft motion for attorney's fees; email with A. Lawrence re same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	4.00h	\$850.00	\$3,400.00	-
12/03/2024	🕒	Email A. Britton re Second Amendment cases; ● Non-billable	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	0.25h	\$850.00	\$212.50	-
12/03/2024	🕒	Correspond with E. Murphy and K. Eiswald re fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,450.00	\$725.00	-
12/04/2024	🕒	Correspond with A. Vergnetti re fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,450.00	\$362.50	-
12/05/2024	🕒	Discuss attorney's fee application with N. Gallagher; research re same; revise application; correspond with A. Lawrence re same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	1.75h	\$850.00	\$1,487.50	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

Activities Export

02/18/2025

5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/05/2024		Review fee application draft; discuss same with K. Eiswald; correspond with A. Lawrence re same.  Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	3.50h	\$1,100.00	\$3,850.00	-
12/05/2024		Review totals for fee application; correspond with N. Gallagher, K. Eiswald, and A. Vergnetti re same.  Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,450.00	\$725.00	-
12/06/2024		Email N. Gallagher re attorney's fee application; revise motion, memorandum of law, and declaration drafts.  Non-billable	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	1.25h	\$850.00	\$1,062.50	-
12/08/2024		Edit fees motion and brief in support.  Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	2.50h	\$1,100.00	\$2,750.00	-
12/09/2024		Email with A. Britton re application for attorneys' fees.  Non-billable	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	0.25h	\$850.00	\$212.50	-
12/10/2024		Correspond with N. Gallagher re attorney's fee application; research re same.  Non-billable	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	1.00h	\$850.00	\$850.00	-
12/11/2024		Edit fees motion and brief in support.  Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.50h	\$1,100.00	\$1,650.00	-
12/12/2024		Correspond with N. Gallagher re	His Tabernacle Church	Kyle	0.25h	\$850.00	\$212.50	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

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Activities Export

02/18/2025

5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		motion for attorney's fees. ● Non-billable	Client v. Nigrelli	Eiswald				
12/14/2024	🕒	Correspond with CM team re fees motion. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$1,100.00	\$275.00	-
12/17/2024	🕒	Review draft fee application; correspond with E. Murphy re same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	1.50h	\$1,450.00	\$2,175.00	-
12/18/2024	🕒	Correspond with CM team re briefing schedule. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	0.25h	\$1,100.00	\$275.00	-
12/18/2024	🕒	Correspond with A. Lawrence and N. Gallagher re extension. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Kyle Eiswald	0.25h	\$850.00	\$212.50	-
12/18/2024	🕒	Prepare extension application; correspond re same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	1.50h	\$1,450.00	\$2,175.00	-
01/14/2025	🕒	Edit and revise fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	7.00h	\$1,550.00	\$10,850.00	-
01/16/2025	🕒	Edit and revise fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	3.00h	\$1,550.00	\$4,650.00	-
01/17/2025	🕒	Edit and revise fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	2.00h	\$1,550.00	\$3,100.00	-
01/20/2025	🕒	Edit and revise fee application.	His Tabernacle Church	Andrew	4.00h	\$1,550.00	\$6,200.00	-
					532.50h		\$664,477.50 532.50h	\$0.00 0.00h

Activities Export

02/18/2025

5:31 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Non-billable	Client v. Nigrelli	Lawrence				
01/31/2025	🕒	Review local rules re PHV admitted attorneys filing documents; confer with A. Lawrence re same. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Ashley Britton	0.50h	\$525.00	\$262.50	-
02/04/2025	🕒	Correspond with A. Ganguly re declaration for fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.25h	\$1,550.00	\$387.50	-
02/12/2025	🕒	Revise fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	1.25h	\$2,100.00	\$2,625.00	-
02/12/2025	🕒	Correspond with E. Murphy re fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.50h	\$1,550.00	\$775.00	-
02/13/2025	🕒	Review supporting materials for fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Erin Murphy	0.25h	\$2,100.00	\$525.00	-
02/13/2025	🕒	Revise declarations for fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	0.75h	\$1,550.00	\$1,162.50	-
02/14/2025	🕒	Edit and revise fee application. ● Non-billable	His Tabernacle Church Client v. Nigrelli	Andrew Lawrence	2.00h	\$1,550.00	\$3,100.00	-
					532.50h		\$664,477.50	\$0.00
							532.50h	0.00h

Exhibit A-2

Activities Export

02/18/2025

5:34 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/07/2022		PHV form mailing. ● Unbilled	His Tabernacle Church Client v. Nigrelli	Nicholas Gallagher	1.00	\$30.00	-	\$30.00
11/08/2022		Shipping expense. ● Unbilled	His Tabernacle Church Client v. Nigrelli	Erin Murphy	1.00	\$20.00	-	\$20.00
12/20/2022		Overnight stay related to oral argument. ● Unbilled	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	1.00	\$532.36	-	\$532.36
12/20/2022		Uber from office to airport. ● Unbilled	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	1.00	\$21.42	-	\$21.42
12/20/2022		Uber from Buffalo airport to hotel. ● Unbilled	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	1.00	\$25.92	-	\$25.92
12/20/2022		Southwest internet. ● Unbilled	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	1.00	\$8.00	-	\$8.00
12/22/2022		Uber from hotel to Buffalo airport. ● Unbilled	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	1.00	\$26.96	-	\$26.96
12/22/2022		Uber from DCA airport to office. ● Unbilled	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	1.00	\$20.91	-	\$20.91
12/22/2022		Travel from Buffalo to DCA. ● Unbilled	His Tabernacle Church Client v. Nigrelli	Trevor Ezell	1.00	\$238.60	-	\$238.60
03/04/2023		Becker Gallagher Legal Publishing - 2-23014 ● Non-billable	His Tabernacle Church Client v. Nigrelli	Paul Clement	1.00	\$613.06	\$613.06	-
03/15/2023		AMTRAK INT WASHINGTON DC ● Unbilled	His Tabernacle Church Client v. Nigrelli	Erin Murphy	1.00	\$168.00	-	\$168.00
							\$613.06 1.00h	\$1,155.78 0.00h

Activities Export

02/18/2025

5:34 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/19/2023		Da Claudio Restaurant (New York)	His Tabernacle Church	Erin Murphy	1.00	\$54.82	-	\$54.82
	● Unbilled		Client v. Nigrelli					
03/21/2023		Don Pepi Pizza (New York)	His Tabernacle Church	Erin Murphy	1.00	\$8.79	-	\$8.79
	● Unbilled		Client v. Nigrelli					
							\$613.06	\$1,155.78
							1.00h	0.00h